

Related DDJ

UNITED STATES DISTRICT COURTS  
WESTERN DISTRICT OF CALIFORNIA

Jose Apollo Sr.,

Plaintiff,

**LACV- 02236-JVS-RAO**

VS.

Civil Action No:

MPD, District of Columbia,

Andre Williams,

Marina Bronstein,

Bijon Hiligh,

Celinet Gutierrez Ortiz,

Noel Rodriguez,

Candance Nicole Brown,

United States Army and CACI INTERNATIONAL

INCORPORATED

Defendants,

“Noteworthy and be advised that this same complaint was recently initially attempted to be file on 12/17/2021 and completely filed on December 20<sup>th</sup> 2021 at 3:25 PM, apparently immediately assigned to Judge James V. Selna and Magistrate Judge Rozella A. Oliver. I filed the case in pro-per requesting to proceed in Forma Pauperis, I was attended for this intake by an African American male, who appear to be a supervising clerk, who told me to await for 2 weeks for the court waiver of fees to be granted, I then received the granting to proceed in Forma Pauperis at my current address 6814 S. Avalon Boulevard, Los Angeles, California 90003, on Saturday, January 8<sup>th</sup> 2022 (there are a number of witness here at the Veterans shelter, called “Volunteers of America,” where I am currently residing that can confirm this fact), the order granting me the right to proceed in Forma Pauperis was dated January 6<sup>th</sup> 2022,

I then wasted no time and returned to the court on 1/10/2022 and filed my motion for leave to amend complaint, on January 10<sup>th</sup> 2022, in this instance I was attended by both African American clerks minding this office, the original clerk intake officer, greeted me joyous, by stating you see I told to wait two weeks and it would be granted, but strangely enough this same supervising clerk ask me to handover the order granting waiver of fees and court cost, and never return my copy of this order to me, nevertheless, the other African American court clerk properly filed onto the court database my 19 pages "motion for leave to amend complaint," how evermore, I did not return to the court until March 9<sup>th</sup> 2022 at 2:20 PM to file a new motion, title "Motion For Leave To Re-Amended Complaint," at such time is when I found out that apparently after this court received my well pleaded amended complaint, in former case CV21-9809 JVS (RAO), that the court had unconstitutionally engaged in fraud upon the court, and outrageously suddenly closed my meritorious case, amongst other in atrocious violations to federal obstructions of justice laws, to include these statutes, 18 U.S. Code 1030- Fraud and related activity in connection with computers, United States Code: Fraud and False Statements, 18 USC 1001-1027 (1964), to also include high crimes like treason, I am well aware to jurisdiction restrictions to sue these corrupt presiding judges and the court clerk and her co-conspirators clerks, for monetary damages, but I do know the rules to remove misconduct prone officers of the court and judicial terrorist judges from the bench and put them in jail through criminal proceedings, on that note, I have requested criminal investigations through the Assistant Attorney General for Civil RIGHTS, and the FBI, Civil RIGHTS DIVISION, to include report to the, Federal Judicial Commission, I do not believe that these law enforcement government agencies, are going to ignore the fact that the presiding judges in my former case obstructed my entire docket and inserted and falsified a court order into the record before the court."

### DAMAGES

"Punitive damage does apply in this case, because I can prove by clear and convincing evidence that my multiple constitutional and civil rights violations, was the result of conspirator's discriminative fraud between Noel Rodriguez and the District of Columbia, Metropolitan Police Department unit 6D, and their respective Misconducts and actions were done with malice." The amount grand total listed in Damages is appropriate, mainly because, the District of Columbia is one of the twelve (12) States that does not have a limit as to how much monetary damages parties can sue their corrupt officers in civil courts.

The Grand Total Damages is in the amount of: **\$264,064,000,000,750,000,000.00**

### NATURE OF ACTION

This precedent case, is directly related to 42 USC 1981, Intentional Infliction of

Emotional Distress, Invasion of Privacy, Fourth Amendment Violations, Fifth Amendment Violations, Fourteenth Amendment Violations, Title 18 USC 242, 18 USC 1001- FRAUD, Assault, Battery, 15 US Code 6604- Punitive damages;

### **JURISDICTION AND VENUE**

All of the allegations contained in the foregoing paragraphs of this Complaint are set forth at length as if the same were incorporated by reference herein.

Pursuant to the Constitution, this Court has subject matter jurisdiction, because most of these claims are based on violations of Federal laws. Pursuant to Federal Laws and the Constitution, this Court has personal jurisdiction over all Defendants because they are all American citizens living and conducting business in the barometers of The United States of America and they knowingly violate numerous well established federal laws. The venue for this case is appropriate because I the plaintiff, Jose Apollo now permanently lives in Western, Los Angeles, California District, even though Defendant's actions, took place in the District of Columbia, this civil case is expressly in "diversity."

### **DEMAND FOR TRIAL BY JURY**

Plaintiff demands a trial by jury on all questions of facts raised by this Complaint;

### **PARTIES**

Plaintiff, Jose Guillermo Apollo is a disable United States Veteran (Marines, Army & Navy), now residing at 6814 S. Avalon Boulevard, Los Angeles, California 90003.

Defendants, Metropolitan Police Department, of the District of Columbia,  
Lieutenant Andre Williams's badge 2149, Sargent Marina Bronstein badge 5632,  
Sargent Bijon Hiligh (vehemently refused to provide his badge number),

Defendant, Celinet Gutierrez Ortiz;

Defendants, Noel Rodriguez, Candance Nicole Brown

Defendants, United States Army and CACI INTERNATIONAL  
INCORPORATED;

The unconstitutional incidents occurred at my then apartment, located at 622  
Eastern Avenue North East, apartment #302, Washington, DC 20019.

### COMPLAINT

Plaintiff Jose G. Apollo ("Plaintiff" or Mr. Apollo), represents himself in -  
Proper, comes now and hereby alleges as follows:

### FACTS

To be in accord and to overcome the heavy burden of the "Plausibility Clause" of  
FRCP (b) (6), Failure to state claim for which relief can be granted, the plaintiff  
down below, states unambiguously, the claims for which relief should be

forwardly Granted? Please see >>> Iqbal v. Ashcroft, 129 S. Ct. 1937 (2009).

42 U.S. Code 1981- Equal rights under the law:

(a) STATEMENT OF EQUAL RIGHTS

All persons within the jurisdiction of the United States shall have the same right in every State and Territory to make and enforce contracts, to sue, is parties, gives evidence, and to full and equal benefit of all laws and proceedings for the security of persons and property as enjoyed by white citizens, and exactions of every kind, and to no other;

(b) “MAKE AND ENFORCE CONTRACTS” DEFINED:

For purposes of this section, the term “make and enforce contracts” includes the making, performance, modification, and termination of contracts and the enjoyment of all benefits, privileges, terms and conditions of the contractual relationship;

(c) PROTECTION AGAINST IMPAIRMENT

The rights protected by this section are protected against impairment by Nongovernmental discrimination and impairment under color of State Law;  
This section, 42 USC 1981(c), was undoubtedly violated by Noel Rodriguez in conspiracy with Metropolitan Police Department, unit 6D, District of Columbia, in furtherance with this fact, Noel Rodriguez engaged and used several racial epithets to describe me, during the 2 years plus, his mother, Celinet Gutierrez and I was

living together to several relatives and family members, amongst other, the last one was when Mr. Rodriguez under extreme bias towards me, while Celinet and I had travel to Los Angeles, California to try and make it to see my Mother before her eminent passing (She, was into her last days), unfortunately for me we got there on Saturday February 29<sup>th</sup> 2020, but my mother passed on Friday 28<sup>th</sup> 2020, since I had told Celinet beforehand that I did not want her son Noel to know about my mother's emergency, but he found out by calling his mother on the 10<sup>th</sup> of March, 2020, while we was in LAX, returning to Washington, DC, he Noel was tantrums challenging his mother for heritage and patrimony of their House in Ensenada, Puerto Rico, according to Noel Rodriguez, because his adoptive Father had giving him his last name and so this house belonged to him by heritage, patrimony and so he Noel was in Puerto Rico in anticipation cursing at his mother firmly thinking that his mother and I were headed to her house, he Noel made a stern emphasis to his mother Celinet then in a prejudicial derogative discriminating way, that if we we're planning and coming to Puerto Rico next, and he stated to her, "NO QUIERO ESE NEGRO AQUI" (meaning I don't want that nigger in my house)," and that at the time he Noel felt like knocking the main door down and changing the locks so that we would not be able to come into the house, that is when Celinet stood up to him, Noel clarifying and explaining to him in a loud manner, that Pedro Rodriguez his adoptive Father had sold the house to her prior to them getting married, only thereafter did He Noel settles down his ferocious discriminatory and bias attacks against me and entered to a reasoning mode briefly because Noel kept trying throughout to come to my house, asking his mother Celinet

behind my back the exact address where she is living, to come to my house un-announced and un-invited, case in point, when Celinet and I lived initially at the Massachusetts Avenue North West, Noel Purposely, without my permission or consent investigated my apartment area, and Celinet then told me that Noel commented that we live in an affluent area of WASHINGTON in the DISTRICT OF COLUMBIA, he was never capable to come to my address there un-announce or un-invited, because I had to move from this close proximity area to American University, under duress, nevertheless Noel, in extreme Prejudice, towards me, also tried to come to my leased apartment on Second Street North West, also un-announce and un-invited, but it was a very brief stay at this Apartment, because it became inhabitable not even a good 2 months of been living there, as a couple with Celinet, how evermore it appears that Noel decided to go all out and risks it all and that is when the December 17<sup>th</sup> 2020 occurred where Noel was able to easily convince the completely corrupt UNIT 6D, from MPD, DC. to recklessly commit the atrocities of breaking and outrageously violating their own laws, and in so doing, also breaking the federal laws listed in this complaint as cause of action. On the other hand, the set of facts in this complaint, clearly evidence and established that my race has a Panamanian Afro Latino and not his Noel preferable Caucasian Puerto Rican, was the reason all along for his continuous discriminatory actions towards me and the ultimate presenting of a false statements and a conspirator's discriminatory fraudulent criminal report with the District of Columbia, MPD, please see >> Ridley v. VMT Long Term Care Management Inc., 68 F. Supp. 3d 88, 90 (D. D. C. 2014); with this authority, I have clearly demonstrated the

surmountable racially discriminatory purpose for the defendant's gross and malicious misconducts; see >> Ridley, 68 F. Supp. 3d at 90, and so I have stated a claim where relief should be granted, against both Noel Rodriguez and the MPD, of the District of Columbia, for this particular cause of action, has required by this Statute, in "SECTION 1981"; "

### INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS:

In the "Intentional Infliction of Emotional Distress," cause of action, I can also show under the District of Columbia Laws (1) that extreme and outrageous conduct by the defendants; (2) intentionally and recklessly violating their own laws of presenting false statements and a fraudulent discriminatory criminal police, claiming that Celinet's life was in eminent danger, when in fact Celinet was all the time of her stay with me very safe at all times, how evermore MPD, District of Columbia, (3) without a court warrant or probable cause, they used excessive force with the batter ram attack, that not only impacted me, but all of the other eight (8) units in composition of the building, these unconstitutional police officers, again I repeat that they conducted an illegal search and seizure, and guns were pointed at me at close range by two misconduct prone MPD officers out of uniform, while Noel Rodriguez arriving with a Klansmen cape and mask "yelling out surprise", which was evidence by several of my neighbors, on these facts, the big question? what kind of ordinary police officer, would allow a Caucasian want to be, like Noel Rodriguez, from the state of Georgia, to execute fully his discrimination convictions against me, because I am a Afro Latino, from Panama, living in the



DISTRICT OF COLUMBIA, it is without any doubt that these accumulated ultra Corrupt collusion cause me severe emotional distress, please see >>> Ben- Kotel v. Howard University, 156 F. Supp. 2d 8, 14 (D. D. C. 2001), thus liability for this cause of action must be ordered, due to the outrageous conspirator's defendants outrageous in character actions done with extreme malice, that certainly was done beyond all possible bounds of decency, again these accumulated unlawful actions by all defendants are clearly regarded as atrocious, and utterly intolerable in civilized community, like the District of Columbia, See > Thompson v. Jasas Corporation, 212 F. Supp. 2d 21, 27-28 (D. D. C. 2002) (citing Honan v. Goyal, 711 A. 2d 812, 818 (D. C. 1988);

THE FOURTH AMENDMENT OF THE CONSTITUTION:

Entails and provides, the right of the people to be secure in their persons, houses, Papers and effects, against unreasonable searches and seizures shall not be violated and no warrants shall be use, but upon probable cause, supported by oath of affirmation, particularly describing the place to be searched and the persons or things to seize, however more, in this instance the Metropolitan Police Department, unit 6D, DC, first decide to violate their own government laws, to surprise me in violation of my privacy, these misconduct prone police officers, claimed that they did not need a warrant, when I asked them for one, but the material fact is that on an emergency police call, MPD, DC was required to have call me and talk to me, prior to violating my privacy rights under the 4<sup>th</sup> Amendment, but the fact remain that, these unconstitutional police officers, knew before hand, that warrantless

searches are strictly prohibited under 4<sup>th</sup> Amendment of the Constitution rules, the fact is that I did not consent to the outrageous and illegal surprise search, in other words these unlawful police officers, violated my reasonable expectation to my privacy, on December, 17<sup>th</sup> 2020, the fact is that on this afore mention day, these (3) police officers, being sued arrived to my apartment and the two out of uniform police officers had guns drawn pointed directly at me, I offered no resistance to the short black police officer, Bijon Hiligh, standing in a crouch stance about six (6) feet from pointing his service revolver straight at me, or much less did I offered resistance to the white female officer, Marina Bronstein, pointing her service revolver at less than 3 inches from my eye balls dressed up and cameo flash, from head to toes, has a ninja police, I could only see her cold blooded eyes ready to assassinate for any wrong move by me at the time of the police unconstitutional incident, this particular fact was evidence by my next door neighbor, how evermore, what is material here is that no probable cause existed, and I did not commit any crime; there were no fights between Celinet Gutierrez and me there certainly were no knives or guns in my house prior to my unlawful arrest and multiple constitutional violations against me, but more importantly, in terms of this lawsuit and this particular cause of action, is the fact that excessive force and deadly force, was used by these unconstitutionally corrupt officers, in the outrageous violation of my 4<sup>th</sup> Amendment rights, while factually, Celinet, Gutierrez left my house unscratched and confirmed by these same corrupt cops police station, I have fully stated a claim for this cause of action whereby, relief must be granted for this here particular 4<sup>th</sup> Amendment Claim;

FIFTH AMENDMENT OF THE CONSTITUTION:

In the Fifth Amendment cause of action, it REQUIRES that “DUE PROCESS OF LAW” be part of any proceeding that denies a citizen “life liberty or property,” again, my due process rights was grossly violated, under the color of law when the MPD, Unit 6D failed miserably and corruptly, to investigate as mandated through their own District of Columbia Laws, I reiterate that throughout this complaint it is mention that under the color of law MPD, DC, decided arbitrarily and illegally, to violate “MY CONSTITUTIONAL DUE PROCES RIGHTS,” and so for this cause of action, I have already stated a claim for wish relief should be granted for this particular claim;

FOURTEENTH AMENDMENT OF THE CONSTITUTION

Entail for purpose of this cause of action, in section 1: That all persons born or naturalized in the United States, and subject to the jurisdiction thereof, are citizens of the United States and of the state wherein they reside, no state shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States; nor shall any state deprive any person of life, liberty, or property, without due process of law, nor to deny to any person within its jurisdiction the equal protection of the laws, for this cause of action relief should also be forwardly granted, because I am a United States citizen, and I was subjected by the MPD, District of Columbia initially to false statements and fraud, which furthered abridged my privileges and liberty through an outrageous false arrest, trespassed

into my house, without due process of law being observe and so doing my equal protection of this particular constitutional law was utterly outrageously violated. In addition, these MPD, District of Columbia constitutional violations is govern by the authorities in this cited case See >>> Alridge V. Rite Aid of Wash., D. C., Inc., 146 F. Supp. 3d 242, 251(D. D. C. 2015);

Title 18 USC 242- DEPRIVATION OF RIGHTS UNDER COLOR OF LAW,

entails as follow: WHOEVER, under the color of any law, statute, Ordinance, regulation, or custom, willfully subjects any person in any State, Territory, Commonwealth, possession or the DISTRICT OF COLUMBIA, to the DEPRIVATION of any Rights, privileges, or immunities secured or protected by the constitution or Laws of the United States, or to different punishments, pain, or penalties, on account of such person being an alien, or by reason of his color, or race, than are prescribed for the punishment of citizens, shall be fined under this title or imprisoned not more than one year, or both, and if bodily injury results from the acts committed in violation of this section or if such acts include the use, attempted use, or threatened use of dangerous weapon, explosives, or fire, shall be fined under this title or imprison not more than 10 years, or both and if death result from the acts committed in violation of this section or if such include kidnapping or attempt to kidnap, aggravated sexual abuse, or an attempt to kill shall be fined under this title or imprisoned for any term of years or for life or both, or maybe sentence to death; I repeat again, that I was threatened by MPD Unit 6D WITH excessive force with the usage of the batter ram and deadly force has guns were

drawn by two (2) of the three rogue MPD police officers that were out of uniform, by not having their badges or name tags on display, at the time that they committed the massive unconstitutional atrocities, on December 17<sup>th</sup> 2020 when in fact these unlawful police officers were willing and able to kill me on the impropriate of a well-known false statement and a false criminal police report against me, and thus, per the laws of this cause of action I want a ten (10) years felony conviction for Officer Andre William and twenty (20) years felony convictions each for Officer Marina Bronstein and Officer Bijon Hiligh, I reiterate that these two highly corrupt police officers were willing and able indeed, to kill me, as in killing a stray dog; For this cause of action I have stated a claim whereby relief should be granted.

18 USC 1001- FEDERAL LAW FRAUD LAW:

Federal fraud law is define as knowingly and intentionally doing any of the following: Falsifying, concealing, or covering up by any trick scheme, or device a material fact; making any materially false, fictitious, or fraudulent statement or representation; again these corrupt cops from MPD, unit 6D, DC, conspired with co-defendant Noel Rodriguez to create a scheme to take Celinet Gutierrez out of my apartment by all means necessary, claiming that her life was in danger while living with me for well over two (2) years, this defendants conspiracy, orchestrated and concealed from me, false statements, and a false criminal report against me; for this cause of action, I have clearly stated a claim where relief should be granted, the fact is that defendants outrageously violated this law hereto.

### ASSAULT:

The fact is that these misconduct prone MPD's of the District of Columbia, knew very well to not have any jurisdiction, whatsoever, I was assaulted by surprise, with guns (deadly force) pointed at me, they acted under the color of law, and willfully deprived me of my constitutional rights, but most important in terms of this particular cause of action, is that these ultra- corrupt police officers, knew that what they was unconstitutionally doing to me was wrong and illegal, by the United States Constitution, but colluded to violate all of my Civil Rights any way. The fact is that the all of the defendants intended to cause me to apprehend imminent harmful contact from them, because their criminal anticipation could have ended my precious life, and any time I think about their unconstitutional actions (which is every day) of putting in jeopardy my precious life without committing any crime whatsoever, I feel very apprehensive and it brings natural chills to my spine. On those factual notes, I have stated a claim to this particular cause of action, whereby relief should be granted.

### BATTERY:

The fact is that on December 17<sup>th</sup> 2020, once I cracked my door after the bate ram, and saw Bronstein and Hiligh pointing their guns at me, ready to kill me at the slightest negative move, however more, officer Marina Bronstein, at proximity quickly shoved my door and me and forced her way viciously into my apartment and there after I was arrested in my own house and both officer Bronstein and officer Hiligh hands were all over me, this officer could not have been more

reckless, with specific intent to kill me, if need be, but the fact is that these corrupt cops, otherwise inflicted very armful and deadly offensive contact on me, while raiding my apartment totally unconstitutionally; on these facts for this particular cause of action, I have effectively stated a claim whereby relief should be granted.

15 US Code 6604- Punitive damages;

For this cause of action there is no doubt that punitive damages is applicable for all Defendants, except for the Army & CACI International Incorporated, because the principal defendants acted unlawfully in conspiracy with extreme malice, and thus no cap to multiplying three (3) times each compensatory damages on the defendants, because the defendants used premeditation, before grossly violating numerous of my Constitutional Civil Rights, the evidences indicate that the defendants had the specific intent to injure me the plaintiff, and get away with breaking all these federal laws mentioned in this complaint, for one, again I repeat, the two officers that used deadly force on me, in anticipated criminal intent they were not wearing their respective name tags or their police badges;

#### PRAYER FOR RELIEF

Wherefore, to cure the conduct alleged in this action, Plaintiff respectfully request the Court to:

A. Declare the actions of MPD and all other defendants as set forth herein, in violating Mr. Apollo's rights under the numerous Federal Laws, and the Constitution mentioned in the complaint that caused injuries, damages and harm to

Mr. Apollo, including, but not limited to extreme emotional distress, loss of reputation, shame, pain and suffering, outrage humiliation, inconvenience, mental anguish and other psychological future damage, and above all that discrimination assault & battery are utterly illegal here in the United States of America, and the Constitution must be honored and respected by every person living in the USA, but more so Constitutional Laws should be uphold by all Police Officers.

B. Declare an award to Jose G. Apollo Sr. in the Grand Total amounts of:  
Andre Williams: 42 USC 1981: \$2trillion dollars, Intentional Infliction of Emotional Distress: \$2trillion dollars, Invasion of Privacy: \$2trillion dollars, Fourth Amendment: \$2trillion, Fifth Amendment: \$2trillion, Fourteenth Amendment: \$2trillion, Title 18 USC 242: \$4trillion dollars, 18 USC 1001- Fraud: \$2trillion dollars, Assault: \$4trillion dollars, Battery: \$2trillion dollars, 15US Code 6604- Punitive damages, would multiply three times the total compensatory damages, for a Grand Total of \$72Trillion Dollars for Officer Andre Williams;

Marina Bronstein: 42 USC 198: \$2trillion dollars, Intentional Infliction of Emotional Distress: \$2trillion Dollars, Invasion of Privacy: \$2trillion dollars, Fourth Amendment: \$2trillion, Fifth Amendment: \$2trillion, Fourteenth Amendment: \$2trillion, Title 18 USC 242: \$8trillion dollars, Assault: \$6trillion dollars, Battery: \$6trillion dollars, 15 US Code 6604- Punitive damages, would multiply three times the total compensatory damages, for a Grand Total of \$96Trillion Dollars, for Officer Marina Bronstein;



Bijon Hiligh Weifare: 42 USC 1981: \$2trillion dollars, Intentional Infliction of Emotional Distress: \$2trillion Dollars, Invasion of Privacy: \$2trillion dollars, Fourth Amendment: \$2trillion, Fifth Amendment: \$2trillion, Fourteenth Amendment: \$2trillion, Title 18 USC 242: \$8trillion dollars, Assault: \$6trillion dollars, Battery: \$6trillion dollars, 15 US Code 6604- Punitive damages, would multiply three times the total compensatory damages, for a Grand Total of \$96trillion dollars, in damages, for Officer Bijon Hiligh Weifare;

For Noel Rodriguez: 42 USC 1981: \$2billion dollars, Intentional Infliction of Emotional Distress: \$2billion dollars, Invasion of Privacy: \$2billion dollars, plus Punitive Damages, bringing his Grand Total to: \$18 Billion Dollars in damages, to Include, that I want possession and ownership of his House located at: 285 Park Avenue, Pooler, Georgia 31322, and for Noel Rodriguez to serve some jail time according to Federal Laws, for the outrageous invasion of privacy and lying to police officers, these are general additional compensatory damages, because he willfully violated these federal criminal laws; if Noel Rodriguez cannot pay his Combine Grand total, then CACI, International Incorporated and the US ARMY would be responsible to pay, for Noel Rodriguez grand total damages;

For Candance Nicole Brown: Intentional Infliction of Emotional Distress: \$1billion dollars, Invasion of Privacy: \$1billion dollars, plus Punitive Damages, bringing her Grand Total in Damages to: \$6Billion, I am also requesting general relief, for

Candance Nicole Brown to serve some jail time for the invasion of my privacy and lying to police officers in conspiracy with Noel Rodriguez; if Candance Nicole Brown cannot pay for her damages in this lawsuit, Noel Rodriguez would be made responsible for her debt to me as a result of being a defendant in this lawsuit;

For Celinet Gutierrez: \$250, 000, 000, 00 MILLION Dollars, for conspiracy to Intentional Infliction of Emotional Distress, bringing her Grand Total to \$750Million Dollars in damages, to include that I also want in compensatory Damages, her House located at: Carretera 325, Km 0.8 Barrio Guaypao, Ensenada, Puerto Rico 00647, if Celinet Gutierrez cannot pay for her monetary portion of the lawsuit, Noel Rodriguez would be made responsible to pay her debt to me.

And lastly for CACI International & the US ARMY: DAMAGES ARE IN THE AMOUNT OF \$20Billion Dollars each: has per Celinet Gutierrez statement to me that her son, Noel Rodriguez, an active duty personnel of the US ARMY, and that he also works for CACI International Incorporated. If so CACI International and the United States Army are both Inadvertently vicariously liable, respond eat superior to Noel Rodriguez conspirator misconducts with MPD, District of Columbia; and the Feres Doctrine does not bar this claim; see>> 28 USC 1346 (b), “District Courts shall have exclusive jurisdiction of civil actions against the United States, for money damages accruing on or after 1 January 1945, for injury or loss of property, or personal injury or death caused by the negligent or wrongful act or omission of any employee of the Government while acting within the scope of his

employment, under circumstances where the U.S., if a private person, would be liable to the claimant in accordance with the law of the place where the act or omission occurred.”

And

28 USC 2764, “The United shall be liable, respecting the provisions of this title to tort claims, in the same manner and to the same extent as a private individual under Like circumstances, but shall not be liable for interest prior to judgment or for Punitive damages;

Again, I the Plaintiff proposed that if Noel Rodriguez cannot pay the amount of his Grand Total accumulated damages then CACI international and the US ARMY should be made to ultimately Pay for Noel Rodriguez Grand Total Damages,

In conclusion, I have flawlessly presented my complaint, based on the Constitution and Federal Laws governing the laws in this Complaint, I expect a favorable resolution by way of trial, unless they the defendants plead guilty to every fact mention in the complaint, in doing so avoiding lengthy exposure to jail time; I have clearly apprise defendants of the claims they are called upon to meet. Please see >> Byrd v. Bates, 220 F .2d 480, 482 (5<sup>th</sup> Cir. 1995);

Respectfully submitted

Jose G. Apollo Sr.

6814 South Avalon

Los Angeles, California 90003

1  
[Handwritten signature of Jose G. Apollo Sr.]  
4/4/22

Contact Telephone (202) 684 0250

worldwidepowerlegalservices@yahoo.com

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and I executed it on 4/4, 2022

Pro-se

  
Jose G. Apollo Sr.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 4<sup>th</sup> day of April, 2022, I

Caused copies of Pro-se, Plaintiff Jose G. Apollo Sr., Complaint, to

Be served by register mail to:

Metropolitan Police Department

District of Columbia Government,

1350 Pennsylvania Avenue N.W.

20004;

And

By certified mail return receipt to:

Celinet Gutierrez Ortiz

P. O. Box 693

Ensenada, 00647-0693

Puerto, Rico

Fed Ex to:

Noel Rodriguez & Candance Nicole Brown at;

285 Park Avenue, Pooler, GA 31322,

and

Fed Ex to:

CACI, International Incorporated and the US Army;

In Lexington County, Sumter, South Carolina, 29406

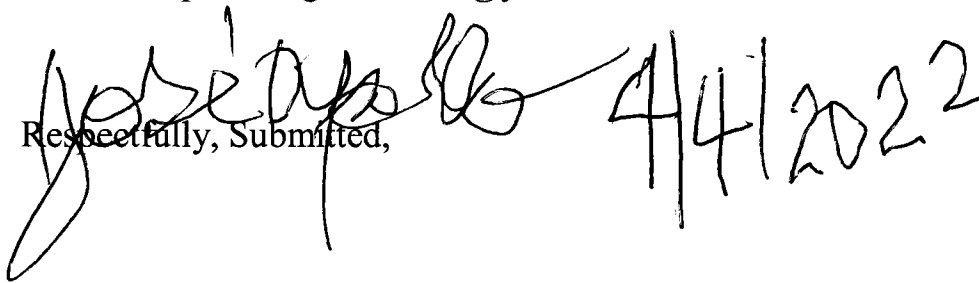
Jose G. Apollo Sr.,

6814 South, Avalon, Los Angeles California, 90003

Telephone 202 684 0250

worldwidepowerlegalservices@yahoo.com

Respectfully, Submitted,

A handwritten signature in black ink, appearing to read "Jose G. Apollo Sr.", is written over the text "Respectfully, Submitted,". To the right of the signature, the date "4/4/2022" is handwritten in black ink.